

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 03-60

Respondent: John Conroy / John White
Title: Vice president / Exec. Director

REQUEST: Conversent Communications of Massachusetts, LLC, Set #2

DATED: November 19, 2003

ITEM: Conversent 2-1 For each of the routes that you have identified in your response (“sic”) to Conversent Interrogatory 1-2, dated November 18, 2003, please describe in detail the factual basis for your claim that the three or more carriers that you identified have deployed dedicated dark fiber transport facilities along the route to provide service to their retail customers. Identify each paper, writing or document that you rely on to support your claims. Please attach as a Rider to this Interrogatory the true copies of all such documents.

REPLY: Please see Verizon panel testimony of John White and John Conroy pages 42-43.

VZ # 5

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ITEM: Conversent 2-2 For each of the routes that you have identified in your response to Conversent's Interrogatory 1-3, dated November 18, 2003, please describe in detail the factual basis for your claim that the two or more carriers that you have identified have deployed their own dark fiber and offer it at wholesale along the same route. Identify each paper, writing or document that you rely on to support your claims. Please attach as a Rider to this interrogatory the true copies of all such documents.

REPLY: Please see the Verizon panel testimony of John Conroy and John White at pages 43-46. All documents cited are publicly available.

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ITEM: Conversent 2-3 Please refer to page 28 of the Initial Panel Testimony where it states that "leased 'dark fiber' is considered to be that carrier's own fiber for purpose of applying the self-provisioning trigger." Please admit or deny that unbundled dark fiber dedicated transport that is leased from an ILEC is not considered to be that carrier's own fiber for purpose of applying the self-provisioning trigger for dark fiber. If you deny this, please explain the basis for your denial.

REPLY: The FCC's Triennial Review Order speaks for itself concerning when unbundled dark fiber is or is not counted as that carrier's own fiber (see 47 CFR § 51.319(e)(3)(i)).

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ITEM: Conversent 2-4 Does Verizon intend to offer at "just and reasonable" rates any dark fiber dedicated transport routes for which it obtains a finding of non-impairment by the DTE? If the answer is yes, please identify what the rates will be, how those rates will be determined and whether the rates, terms and conditions will be tarified.

REPLY: Verizon objects to this request on the grounds that the question asks for information that is not relevant to the impairment analysis at issue in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence.